



U.S. Department
of Transportation

Research and
Special Programs
Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

MAR 30 1999

Mr. Carlo De Mercurio
Danzas Verona
Danzas S.P.A
Via Torricelli, 49
1-37136 Verona, Italy

Ref. No. 99-0060

Dear Mr. De Mercurio:

This is in response to your letter of February 19, 1999, regarding the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked us to provide reportable quantity values (RQs) for a hazardous material described as "Environmentally hazardous substance, liquid, n.o.s, UN3082," that contains 2,3,5,6-tetrafloro benzyl trans-2,2,2-dichlorovenyl and 3,3,dimethylcyclopropane carboxylate.

The HMR require the letters "RQ" to appear on a shipping paper, if the hazardous material meets the definition of a hazardous substance (§ 172.203(c)(2)). As defined in § 171.8, a hazardous substance is a material that is listed in Appendix A to § 172.101, is in a package that meets or exceeds the RQ, and when in a mixture or solution, has a concentration by weight which equals or exceeds the concentration corresponding to the RQ of the material as listed in the table in § 171.8. A material must meet all of these requirements in order to be a hazardous substance. Appendix A lists hazardous substances by their chemical name or waste name, and lists each substance's corresponding RQ value in pounds or kilograms.

You should review Appendix A to determine if the chemicals in your customer's material have RQs. If the chemicals do not appear in Appendix A, then you need not mark RQ on your

172.203(c)

shipping paper. I have enclosed copies of appropriate parts of §§ 171.8, Appendix A to 172.101, and 172.203.

I hope this satisfies your request.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. A. Gale', with a stylized, cursive flourish extending from the end.

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards.

Enclosures

D/HM-10

DANZAS S.P.A.
VIA TORRICELLI, 49
I-37136 VERONA
TELEFONO 39 145 19217111
TELEFAX EXPORT TERRA 39 145 19217246
TELEFAX IMPORT TERRA 39 145 19217202
TELEFAX EXPORT MARE 39 145 19217247-39 145 19217214
TELEFAX IMPORT MARE-AEREO 39 145 19217280
TELEFAX EXPORT AEREO 39 145 19217212
TELEX 480128

TELEFAX

DANZAS

BAH

§ 172.203(c)

99-0060

ITA-X MESSAGE

19/02/99

TO OFFICE OF HAZARDOUS MATERIALS EXEMPTIONS & APPROVALS (DHM-30)

VERONA, FEB.19th.1999

REF. AIR FREIGHT SHIPMENT OF HAZARDOUS MATERIAL FROM ITALY
TO THE U.S.A.

DEAR SIRs,

ONE OF OUR CUSTOMER IS READY TO SHIP ONE PARCEL OF UN 3082
(ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. -2,3,5,6 -
TETRAFLORO BENZYL TRANS-2,2,2-DICHLOROVENYL, 3,3,
DIMETHYLCYCLOPROPANE CARBOXYLATE) CLASS 9, AND THE CARRIER
WHICH HAS BEEN CHOSE FOR AIR TRANSPORT, NOTICED THAT THE
SHIPPER HASN'T SHOWED THE 'RQ VALUE'.
SINCE THE SHIPPER IS OBLIGED TO ENTER THIS RQ VALUE, HE HAS
ALREADY ASKED THIS PARTICULAR TO THE CNEE, BUT UNFORTUNATELY,
HE SAID THAT HE DOESN'T KNOW ANYTHING ABOUT THIS VALUE.

KINDLY, I'M ASKING TO YOU TO PROVIDE, IF POSSIBLE, ALL THE NECESSARY
PARTICULARS, IN ORDER TO HELP MY CUSTOMER, AND GO AHEAD WITH
THE SHIPMENT.

I REMAIN AT YOUR DISPOSAL FOR ANY FURTHER INFORMATION
YOU MIGHT NEED.

WITH KINDEST RGDS.

DANZAS VERONA
CARLO DE MERCURIO

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